

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERNARD ROSS HANSEN, and  
DIANE RENEE ERDMANN,

Defendants.

Case No. CR18-0092-RAJ

**JOINT STIPULATION AND ORDER  
EXTENDING DEADLINE FOR  
MOTIONS *IN LIMINE* AND  
REGARDING JURY SELECTION**

IT IS HEREBY STIPULATED by and between all counsel that, subject to Court approval, the deadline for filing motions *in limine* and regarding jury selection shall be extended from April 2, 2021, to April 19, 2021, with responses (if any) due on May 3, 2021.

Pursuant to this Court's Order Continuing Trial and Setting Amended Case Schedule (Dkt. No. 219), trial in this case is set for July 6, 2021. The current deadline for filing motions *in limine* and regarding jury selection is April 2, 2021. Subject to Court approval, the parties have stipulated to a continuance of that deadline to April 19, 2021.

JOINT STIPULATION AND ORDER  
EXTENDING DEADLINE FOR MOTIONS *IN*  
*LIMINE* AND REGARDING JURY  
SELECTION  
(Case No. 18-cr-0092-RAJ) - 1

LAW OFFICES  
**CALFO EAKES LLP**  
1301 SECOND AVENUE, SUITE 2800  
SEATTLE, WASHINGTON 98101-3808  
TEL (206) 407-2200 FAX (206) 407-2224

1 The brief continuance of the motions deadline will allow the parties to continue to work on  
2 narrowing or resolving several issues in the parties' potential motions *in limine* without Court  
3 intervention. When the parties met and conferred about potential motions *in limine* on March 31,  
4 2021, the parties discussed avenues for trying to narrow or resolve several of the issues in their  
5 proposed motions. The parties have since agreed to a schedule for further exchanges of information  
6 and discussions that are aimed at resolving the issues without Court intervention. A brief  
7 continuance would allow the parties time to pursue these efforts.

8 At this time, the parties do not foresee this extension causing delay to any other currently set  
9 deadlines, aside from a continuance of the motions hearing the Court set, if needed, for April 30,  
10 2021.

11 For the above reasons, and subject to Court approval, the parties hereby agree and stipulate  
12 that the deadline for the parties to file motions *in limine* and regarding jury selection shall be  
13 extended to April 19, 2021, with responses (if any) due on or before May 3, 2021.

14 It is so stipulated.

15 ///

16  
17  
18 ///

19  
20  
21 ///

22  
23  
24 ///

25  
JOINT STIPULATION AND ORDER  
EXTENDING DEADLINE FOR MOTIONS *IN*  
*LIMINE* AND REGARDING JURY  
SELECTION  
(Case No. 18-cr-0092-RAJ) - 2

LAW OFFICES  
**CALFO EAKES LLP**  
1301 SECOND AVENUE, SUITE 2800  
SEATTLE, WASHINGTON 98101-3808  
TEL (206) 407-2200 FAX (206) 407-2224

1 Dated this 1st day of April, 2021.

2 Respectfully submitted,

3 **CALFO EAKES LLP**

4 By: s/ Angelo J. Calfo  
5 Angelo J. Calfo, WSBA #27079  
6 Patricia Eakes, WSBA # 18888  
7 Anna F. Cavnar, WSBA #54413  
8 Henry C. Phillips, WSBA #55152  
9 1301 Second Avenue, Suite 2800  
10 Seattle, WA 98101  
11 Telephone: (206) 407-2200  
12 Fax: (206) 407-2224  
13 [angeloc@calfoeakes.com](mailto:angeloc@calfoeakes.com)  
14 [pattye@calfoeakes.com](mailto:pattye@calfoeakes.com)  
15 [annac@calfoeakes.com](mailto:annac@calfoeakes.com)  
16 [henryp@calfoeakes.com](mailto:henryp@calfoeakes.com)

17 *Attorneys for Defendant Bernard Ross Hansen*

18 **TESSA GORMAN**

19 Acting United States Attorney

20 By: s/ Brian Werner  
21 BRIAN WERNER  
22 BENJAMIN T. DIGGS  
23 Assistant United States Attorneys  
24 700 Stewart Street, Suite 5220  
25 Seattle, Washington 98101  
Telephone: (206) 553-7970  
[brian.werner@usdoj.gov](mailto:brian.werner@usdoj.gov)  
[benjamin.diggs@usdoj.gov](mailto:benjamin.diggs@usdoj.gov)

*Attorneys for the United States*

-and-

**AOKI LAW PLLC**

By: s/ Russell M. Aoki  
Russell M. Aoki, WSBA No. 15717  
Isham M. Reavis, WSBA No. 45281  
1200 Fifth Avenue, Suite 750  
Seattle, Washington 98101  
(206) 624-1900 Phone  
(206) 442-4396  
[russ@aokilaw.com](mailto:russ@aokilaw.com)  
[isham@aokilaw.com](mailto:isham@aokilaw.com)

**CORR CRONIN LLP**

Steven W. Fogg, WSBA No. 23528  
Benjamin C. Byers, WSBA No. 52299  
1001 Fourth Avenue, Suite 3900  
Seattle, Washington 98154  
(206) 625-8600 Phone  
(206) 625-0900 Fax  
[sfogg@corrchronin.com](mailto:sfogg@corrchronin.com)  
[bbyers@corrchronin.com](mailto:bbyers@corrchronin.com)

*Attorneys for Defendant Diane Renee Erdmann*

ORDER

THIS MATTER having come on before the above-entitled Court upon stipulation of counsel, and the Court having examined the records and being fully advised in the matter, now, therefore,

IT IS HEREBY ORDERED that the deadline for filing motions *in limine* and regarding jury selection shall be extended from April 2, 2021, to April 19, 2021, with responses (if any) due on or before May 3, 2021.

DATED this 2nd day of April, 2021.



The Honorable Richard A. Jones  
United States District Judge